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**DATE: 2/24/94****TIME: 3:10 p.m.****PLEASE DELIVER TO:****NAME: Diane Huffman****FIRM:****ADDRESS:****BUSINESS TELEPHONE:****FACSIMILE TELEPHONE: 913-551-7947****FROM: George von Stammwitz****TOTAL PAGES INCLUDING THIS PAGE: 6****IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL (314) 621-5070****and ASK FOR EXTENSION 7975.****RE:**

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**ARMSTRONG, THASDALE, SCHLAFLY & DAVIS**

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George M. von Stamwitz  
(314) 342-8817KANSAS CITY, MISSOURI  
BELLEVILLE, ILLINOIS  
OLATHE, KANSAS

February 23, 1994

VIA FEDERAL EXPRESSRowena Michaels  
FOIA Officer  
Public Affairs Office  
U.S. EPA, Region VII  
726 Minnesota Avenue  
Kansas City, Kansas 66101

Dear Ms. Michaels:

The purpose of this letter is to request, pursuant to the Freedom of Information Act, all releasable records you have regarding the facility located on 2300-2322 Marconi Street (former McQuay Norris Facility), St. Louis, Missouri.

This request includes all RCRA and Superfund (CERLIS ID# MOT300010345) enforcement and permit files maintained by the Region.

I will be at EPA offices on Tuesday, March 1, 1994 on other matters and have tentatively arranged to see files with Diane Huffman at 2:00 p.m.

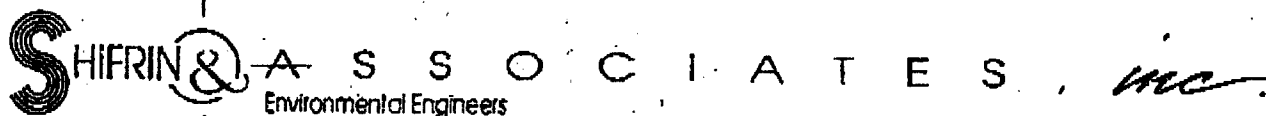
Thank you for your prompt consideration of this request.

Sincerely,

  
George M. von Stamwitz

GMS:clm

cc: Leonard Kintz  
Walter Shifrin



May 4, 1993

Mr. Alan R. Milster, Vice President  
Mercantile Bank of St. Louis  
Special Assets Division  
Mercantile Tower, Tram 10-9  
P.O. Box 524  
St. Louis, Missouri 63166-0524

Re: Limited Subsurface Investigation  
McQuay-Norris Property  
Marconi Street  
St. Louis, Missouri 63110

Dear Alan:

In accordance with your February 8, 1993 acceptance of our proposal of February 3, 1993, a limited subsurface investigation for hazardous wastes has been conducted at the above referenced site. Three (3) soil borings were advanced on March 18, 1993. The borings were placed at the locations shown on Figure No. 1.

The locations of the borings were chosen to obtain samples of the soil below the former hazardous waste storage area (BH-1) and beneath the chrome plating and printing facility (BH-2 and BH-3). A search of records of the Metropolitan St. Louis Sewer District (MSD) was performed prior to the borings in an attempt to locate the sewers on the subject site. Information available on the former McQuay-Norris operations indicated that a plating process had been one used in the production of piston rings at the site. The company had been cited for illegal discharge of the wastewaters to the sewers. Figure No. 1 is a copy of a portion of the permit drawing for revisions to the existing stormwater drains made in 1986 in connection with improvements to a loading dock ramp at Building Nos. 2 and 3 and removal of a frame building (former location of plating and printing facilities). Based upon this information and the location of the former hazardous waste storage building, the bore holes were located as shown on Figure No. 1.

Each boring was advanced using a 2.5-inch solid flight soil auger which was decontaminated between holes to prevent potential cross contamination. Undisturbed samples were obtained at 30-inch intervals using a decontaminated stainless steel split-spoon sampler which was pushed ahead of the auger. Since each boring was advanced to a total depth of fifteen (15) feet, six (6)

Mr. Alan R. Milster, Vice President  
Mercantile Bank of St. Louis  
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individual samples were collected. A log of the conditions found during the borings is included as Exhibit I. Each sample was placed in a laboratory furnished clean glass container. All of the samples were placed in a pre-chilled ice filled cooler for preservation and transportation to the laboratory. The samples were delivered using a chain of custody procedure to American Technical & Analytical Services, Inc. (ATAS), Maryland Heights, Missouri for analysis.

The laboratory was instructed to make one (1) composite sample of equal volumes of soil from each sample from each bore hole to be analyzed. Each of the three (3) composite samples was analyzed for the total concentration of each of the eight (8) Resource Recovery and Conservation Act (RCRA) metals and volatile organic compounds (VOCs). A copy of the laboratory report is attached as Exhibit II.

A review of the ~~data~~ indicates the presence of only very low levels of volatile organics - 12 ug/l of ~~total volatile organic compounds~~ of toluene in the sample from BH-1, 33 ug/l of total-1,2-dichloroethene and 56 ug/l of ~~total volatile organic compounds~~ in BH-2, and 28 ug/l acetone, 4 ug/l toluene and 4 ug/l total xylenes in the sample from BH-3. All of these values are below the clean-up guidelines issued by the MDNR for underground gasoline storage tanks and site specific clean-up criteria for non-gasoline analytes at other locations throughout the state. The concentrations of total metals found is similar. The results of these analyses expressed in mg/kg or ppm and typical clean-up criteria are as follows:

CHARACTERISTIC	BH-1	BH-2	BH-3	MDOH
Arsenic (mg/kg)	11.8	12.3	ND	11
Barium (mg/kg)	250.0	79.0	104.0	3,900
Cadmium (mg/kg)	ND	ND	ND	28
Chromium (mg/kg)	26.4	23.2	20.0	280
Lead (mg/kg)	85.8	24.6	17.8	240
Silver (mg/kg)	ND	ND	ND	280
Selenium (mg/kg)	ND	ND	ND	280
Mercury (mg/kg)	ND	ND	ND	17

It may be seen that all of the metals found are at concentrations below the tentative guidelines issued by the Missouri Department of Health (MDOH), particularly those which may have been involved with the former plating operations - cadmium and chromium. Based upon this

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Mercantile Bank of St. Louis  
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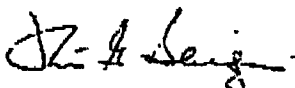
information from our limited sub-surface investigation, it is our opinion that further investigations are not warranted and that metals concentrations on the site do not create a situation requiring any remediation. Since the native soils in Missouri have high metals contents, it is likely that the detected values represent naturally occurring metals.

Based upon this very limited sub-surface investigation, it does not appear that the former plating operations or the storage of hazardous wastes at the location indicated in prior reports has adversely impacted the subject site from an environmental viewpoint. Further, based upon the reported activities at the site, other than the closure of the underground storage tanks on the south side of Building 5 and the operation and maintenance of the asbestos containing material which is present in the buildings (Shifrin & Associates, Inc. has not examined this material or determined its extent or condition), no other actions are proposed to address environmental concerns on the site.

The conclusions drawn in this report are based upon the limited data available from the field observations and subsequent laboratory analyses of the soil samples collected. No investigative methods can completely eliminate the possibility of obtaining partially imprecise or incomplete information; it can only reduce this possibility to an acceptable level. Professional judgement was exercised in gathering and analyzing the information. Like all professionals rendering advise, we do not act as absolute insurers of the conclusions we reach, but we commit ourselves to care and competence in reaching these conclusions. Our work has been performed with the usual thoroughness and competence of the environmental consulting profession. No other warranty or representation, either expressed or implied, is included or intended.

If you have any questions or need additional information, please feel free to call upon us at your convenience. We appreciate the opportunity to be of service to you on this matter.

Sincerely yours,  
SHIFRIN & ASSOCIATES, INC.



Walter G. Shifrin, P. E., President

WGS:lhs

Enclosure

